



Aaron N. Solomon, Esq.
ASolomon@kdvlaw.com

Taylor M. Ferris, Esq.
TFerris@kdvlaw.com

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/26/2021

Kaufman Dolowich & Voluck, LLP
135 Crossways Park Drive, Suite 201
Woodbury, New York 11797
Telephone: 516.681.1100
Facsimile: 516.681.1101
www.kdvlaw.com

July 26, 2021

VIA ECF

District Judge Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Luis Arellano et al. v. Highline Construction Corp. et al.
Case No.: 21-cv-2318-(VEC)

Dear Judge Caproni:

This firm represents the defendants, Highline Construction Group, LLC and Mark Dobbin (collectively referred to hereinafter as “Defendants”), in the above-referenced matter.

The parties have made significant progress towards the completion of the settlement agreement but require additional time to finalize, sign and complete the necessary settlement paperwork, as well as prepare the letter motion seeking Court approval. As such, we write this letter, jointly with counsel for Plaintiffs, to respectfully request that the deadline to file a motion for approval of the settlement be extended from July 28, 2021 until August 13, 2021 and to adjourn the Court Conference set for July 30, 2021, to any date of the Court’s choosing after August 13, 2021 should the agreement not be timely filed. This is the first request for an extension of this deadline.

We thank Your Honor for all courtesies extended.

Respectfully submitted,
Kaufman Dolowich & Voluck, LLP



Taylor M. Ferris

Cc: All Counsel of Record (via ECF)

Application GRANTED. The settlement agreement is due by **August 13, 2021**. If no agreement is filed by August 13, 2021, a conference will be held on **August 20, 2021 at 10:00 a.m.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 2318. The conference scheduled for July 30, 2021 is canceled.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

7/26/2021